

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

YETI COOLERS, LLC,

Plaintiff,

v.

**WAL-MART STORES, INC. and
OLYMPIA TOOLS INTERNATIONAL,
INC.,**

Defendants.

Case No. 1:16-cv-00454-RP

The Honorable Robert L. Pitman

JURY TRIAL DEMANDED

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c) and Local Civil Rule 26(c), Plaintiff, YETI Coolers, LLC, on one hand, and Defendants Wal-Mart Stores, Inc. and Olympia Tools International, Inc., on the other, (collectively, “the Parties”), jointly move for entry of the agreed Protective Order that is attached as Exhibit 1.

The Parties believe that this action will involve exchanging information between the Parties and the production of information by non-parties that the disclosing party considers to be sensitive, confidential, and/or proprietary, such as non-public research and development information, non-public technical information, non-public marketing information, and non-public financial information. Such information is valuable at least because it is not generally known to the public nor shared between the Parties or their competitors. There is therefore good cause to enter the Parties’ agreed Protective Order to protect such information. Accordingly, the Parties respectfully request that the Court enter the attached Protective Order.

Dated: February 10, 2017

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2017, I caused the foregoing document to be electronically filed with the Clerk of the court pursuant to the Electronic Filing Procedures and using the CM/ECF system, and that a true and correct electronic copy was thereby caused to be served on Defendant by and through its counsel of record.

/s/ Janice V. Mitrius
For YETI Coolers, LLC